

1 Mark C. Hansen (admitted *pro hac vice*)
Michael J. Guzman (admitted *pro hac vice*)
2 David L. Schwarz (CA Bar No. 206257)
3 *Attorneys for Nicholas Pritzker*
KELLOGG, HANSEN, TODD, FIGEL &
4 FREDERICK, P.L.L.C.
1615 M Street, N.W., Suite 400
5 Washington, D.C. 20036
TEL: (202) 326-7900
6 mhansen@kellogghansen.com
7 mguzman@kellogghansen.com
dschwarz@kellogghansen.com
8
9

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 IN RE: JUUL LABS, INC., MARKETING,
13 SALES PRACTICES, AND PRODUCTS
14 LIABILITY LITIGATION

Case No. 3:19-md-02913-WHO

ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED

15 THIS DOCUMENT RELATES TO:

16 *Cole Aragona v. Juul Labs, Inc., et al.*,
Case No. 3:20-cv-1928;
17 *Jordan Dupree v. JUUL LABS, INC., et al.*,
Case No. 3:20-cv-03850;
18 *Kaitlyn Fay v. JUUL LABS, INC., et al.*,
Case No. 3:19-cv-07934;
19 *Jennifer Lane v. JUUL LABS, INC., et al.*,
Case No. 3:20-cv-04661;
20 *Bailey Legacki v. JUUL LABS, INC., et al.*,
Case No. 3:20-cv-01927;
21 *Walker McKnight v. JUUL LABS, INC., et al.*,
Case No. 3:20-cv-02600;
22 *Carson Sedgwick v. JUUL LABS, INC., et al.*,
Case No. 3:20-cv-03882;
23 *Ben Shapiro v. JUUL LABS, INC., et al.*,
Case No. 3:19-cv-07428; and
24 *Matthew Tortorici v. JUUL LABS, INC., et*
25 *al.*, Case No. 3:20-cv-03847
26
27
28

TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Defendants Hoyoung Huh, Nicholas Pritzker, and Riaz Valani (the “Non-Management Directors”) will and hereby do move the Court, pursuant to Civil Local Rule 79-5(f), for an administrative order to consider whether another party’s material contained in the following documents should be sealed:

- The unredacted version of Exhibit A: Plaintiff’s Second Supplemental and Amended Responses to Defendant JUUL Lab Inc.’s First Set of Interrogatories to Plaintiff Cole Aragona;
- The unredacted version of Exhibit B: Plaintiff’s Second Supplemental and Amended Responses to Defendant JUUL Lab Inc.’s First Set of Requests for Production of Documents to Plaintiff Cole Aragona; and
- The unredacted version of Exhibit C: Plaintiff Cole Aragona’s Amended Plaintiff Fact Sheet.

The Non-Management Directors file this motion pursuant to the Amended Protective Order (ECF No. 1282) and Civil Local Rule 79-5(f). Pursuant to Civil Local Rules 79-5 and 7-11(c), no hearing date has been set.

Material to Be Considered for Sealing

The Parties have designated materials contained and referred to in the above-referenced filings as confidential and highly confidential under the Amended Protective Order (ECF No. 1282).

Subsection (f) of Local Rule 79-5 sets forth procedures that apply when a party seeks to file information designated as confidential by another party or non-party. This Administrative Motion is based on the Parties’ designation of certain information as confidential, highly-confidential – attorneys’ eyes only, or highly confidential under the protective orders entered in this action. Under Local Rule 79-5(f)(3), the Designating Parties have seven days to file a statement or declaration establishing that the material warrants sealing.

For the foregoing reasons, the Non-Management Directors respectfully requests that this Court provisionally seal Exhibits A, B, and C.

The following attachments accompany this Motion:

1. The Declaration of Michael J. Guzman in Support of the Administrative Motion to Consider Whether Another Party's Material Should Be Sealed;
2. Exhibit A: Plaintiff's Second Supplemental and Amended Responses to Defendant JUUL Lab Inc.'s First Set of Interrogatories to Plaintiff Cole Aragona, to be filed provisionally under seal;
3. Exhibit B: Plaintiff's Second Supplemental and Amended Responses to Defendant JUUL Lab Inc.'s First Set of Requests for Production of Documents to Plaintiff Cole Aragona, to be filed provisionally under seal;
4. Exhibit C: Plaintiff Cole Aragona's Amended Plaintiff Fact Sheet, to be filed provisionally under seal; and
5. A Proposed Order granting the Administrative Motion to Consider Whether Another Party's Material Should Be Sealed.

DATED: January 22, 2025

Respectfully submitted,

By: /s/ Michael J. Guzman

Mark C. Hansen (admitted *pro hac vice*)

Michael J. Guzman (admitted *pro hac vice*)

David L. Schwarz (CA Bar No. 206257)

**KELLOGG HANSEN TODD FIGEL &
FREDERICK, P.L.L.C.**

1615 M Street, N.W. Suite 400

Washington, DC 20036

TEL: (202) 326-7900

mhansen@kellogghansen.com

mguzman@kellogghansen.com

dschwarz@kellogghansen.com

*Attorneys for Non-Management Director Defendants
Huh, Pritzker, and Valani*